

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Gary W. Gibby

Plaintiff,

v.

Greif, Inc. (Individually and D/B/A
Caraustar Industrial & Consumer Products
Group Inc), Greif Packaging, LLC, YRC,
Inc., John Doe Truck Driver, John Doe
Individual, John Doe Business
Entity/Association, and Trailer Moves Inc.,

Defendants.

Civil Action

File No.: 0:21-4129-MGL

**DEFENDANT YRC, INC.'S 26(a)(1)
DISCLOSURES**

RULE 26(a)(1) REQUIRED DISCLOSURES

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information:

RESPONSE:

**A. Garry W. Gibby
c/o Grady McMehan
772 Cherry Road
Rock Hill, SC 29731**

Mr. Gibby is expected to testify regarding his recollection of the accident, his alleged injuries, and other facts and information of which he has personal knowledge.

**B. Robert Webber
c/o Richard E. McLawhorn, Jr.
1515 Lady Street
Columbia, SC 29201**

Mr. Webber was the YRC, Inc. driver who was present for the accident described in Plaintiff's Complaint. He is expected to testify regarding his recollection of the accident.

- C. **Representative of Grief, Inc**
c/o Hendrick Gardner Kincheloe & Garofalo, LLP
1230 Main Street, Suite 3256
Columbia, SC 29201

This individual is expected to testify regarding the allegations contained in the Complaint and other facts and information of which he/she has personal knowledge.

- D. **Representative of Trailer Moves, Inc.**
2813 74th St
Lubbock, TX 79423

This individual is expected to testify regarding the allegations contained in the Complaint and other facts and information of which he/she has personal knowledge

(B) A copy of, or a description by category and location of, all documents, data, compilations, and tangible things in the possession, custody or control of the party and that are relevant to the disputed facts alleged with particularity in the pleadings.

RESPONSE: Discovery is ongoing, and Defendants are actively still searching for documents relevant to this case. Without limiting the foregoing limitations set forth above, Defendants will rely on the following documents, data compilations, and tangible things as follows:

- 1. Accident Report bates labeled YRC 000001-000003**
- 2. Photos/emails associated with photographs of trailer after accident YRC 000381-000389.**

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: Defendants have not asserted any claim for damages in this action.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment

which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: See documents bates labeled YRC 000004-000380 for YRC's applicable insurance policy.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/Richard E. McLawhorn, Jr.
Richard E. McLawhorn, Jr.,
Adam M. Crain
1515 Lady Street
Post Office Box 12129
Columbia, South Carolina 29211
(803) 256-2233
ATTORNEYS FOR DEFENDANT YRC, INC.

Columbia, South Carolina
February 4, 2022



OLD REPUBLIC INSURANCE COMPANY

MOTOR CARRIER'S INDEMNITY

INSURANCE POLICY

Policyholder Issuing and Servicing Office:

Old Republic Risk Management, Inc.
445 South Moorland Road, Suite 300
Brookfield, WI 53005
Tel: (877) 797-3400
Fax: (262) 797-0486



OLD REPUBLIC INSURANCE GROUP

J-01 (01/16)

INSURANCE IS PROVIDED BY
THE COMPANY DESIGNATED ON THE DECLARATION PAGE

IN WITNESS WHEREOF, we have caused this policy to be executed and attested, and, if required by state law, this policy shall not be valid unless countersigned by our authorized representative.

OLD REPUBLIC INSURANCE COMPANY
133 Oakland Avenue
Greensburg, Pennsylvania 15601
A Stock Company

A handwritten signature in black ink, appearing to be "James R. Smith", written in a cursive style.

Secretary

A handwritten signature in black ink, "Craig R. Smiddy", written in a cursive style.

President



OLD REPUBLIC INSURANCE COMPANY

OLD REPUBLIC INSURANCE COMPANY

Executive Office: 414 W. Pittsburgh, Greensburg, Pennsylvania 15601

Administrative Office: 445 South Moorland Road, Suite 300, Brookfield, WI 53005

MOTOR CARRIER'S INDEMNITY POLICY DECLARATIONS

Producer: #546
Willis of Greater Kansas, Inc.
Overland Park, KS

POLICY NUMBER: MWML 18562
PREVIOUS NUMBER: MWML 18562

Item 1. **NAMED INSURED:** YRC Worldwide Inc. (See Form MC 546 001 0309)

PRINCIPAL ADDRESS: 10990 Roe Avenue
Overland Park, KS 66211

Item 2. **POLICY PERIOD:** From: 12/01/18 To: 03/01/19
12:01 a.m. Standard Time at the address of the Named Insured stated above.

Item 3. **COVERAGES PROVIDED**
Indemnity pursuant to this policy is provided only for those coverages indicated below as included:

COVERAGES	INCLUDED
A. Personal Injury	XX
B. Property Damage	XX
C. Uninsured and Underinsured Motorists	XX
D. Personal Injury Protection	XX

Item 4. **LIMIT OF INDEMNITY**
\$ 6,000,000 Ultimate Net Loss All Coverages Combined Per Occurrence

Item 5. **DEDUCTIBLE**
\$ 6,000,000 Ultimate Net Loss

Item 6. **PREMIUM COMPUTATION**
Estimated Annual Premium [REDACTED]
Minimum Annual Premium [REDACTED]
Premium Basis [REDACTED]

Item 7. **FORMS AND ENDORSEMENTS ATTACHED AND MADE A PART OF THIS POLICY AT ISSUE:**

12/18/18

Date

GAM/HIS

Authorized Representative